UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ASTELLAS INSTITUTE FOR REGENERATIVE MEDICINE,

Plaintiffs,

v.

IMSTEM BIOTECHNOLOGY, INC., XIAOFANG WANG, and REN-HE XU,

Defendants.

C.A. No. 1:17-cv-12239

ASSENTED-TO MOTION FOR WITHDRAWAL OF APPEARANCE

Pursuant to Local Rule 83.5.2(c)(2), the undersigned respectfully requests leave to withdraw the appearance of Benjamin M. Stern of the law firm of Verrill Dana, LLP for Defendants ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu (the "Defendants") in this matter.

Mr. Stern has left the employment of Verrill Dana, LLP. Defendants will continue to be represented by attorneys of record from Verrill Dana, LLP and Quinn Emanuel Urquhart & Sullivan, LLP. No party will be prejudiced if this motion is granted. Neither Defendants nor Plaintiff Astellas Institute for Regenerative Medicine oppose the relief sought in this motion.

WHEREFORE, the undersigned respectfully requests that this Court grant this motion and withdraw Benjamin M. Stern from representing Defendants in this matter.

Dated: September 9, 2021

VERRILL DANA LLP

/s/ Timothy Shannon

Timothy R. Shannon, MA Bar # 655325 Martha C. Gaythwaite, MA Bar # 187650 VERRILL DANA LLP One Portland Square Portland, Maine 04101 (207) 774-4000 tshannon@verrill-law.com mgaythwaite@verrill-law.com

Counsel for ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.1, I certify that on September 9, 2021 I conferred with counsel for the Plaintiff regarding the relief requested herein. Counsel for Plaintiff has indicated that they do not oppose the relief requested herein.

/s/ Timothy R. Shannon
Timothy R. Shannon

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2021, I caused a true copy of the foregoing document to be served upon all counsel of record via the Court's CM/ECF electronic filing system, as well as upon Defendants ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu via e-mail.

/s/ *Timothy R. Shannon* Timothy R. Shannon